

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>VS.</b>	§	Criminal Action H-20-CR-00455
	§	
<b>ZHENG DONG CHENG</b>	§	

**ZHENG DONG CHENG’S SUPPLEMENT TO  
MOTION FOR REVOCATION OF DETENTION ORDER**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE ANDREW S. HANEN:

ZHENDONG CHENG, Defendant, (“Dr. Cheng”) supplements his *Opposed Motion for Revocation of Detention Order* and shows:

**I. ADDITIONAL UNENCUMBERED REAL ESTATE AVAILABLE TO PLEDGE AS  
SECURITY FOR DR. CHENG’S APPEARANCE**

Dr. Cheng has additional unencumbered property that may be pledged to secure his appearance. The lien on the real property at 715 Pasler Street, College Station, Texas, 77840, has been released. *See* Ex. A. It is not subject to any other claim, lien, mortgage, or encumbrance. For 2020, the Brazos County Appraisal District appraised the value of the land and improvements there at \$291,774.<sup>1</sup>

This property may be pledged as additional collateral to secure a bond. 18 U.S.C. 3142(c)(1)(B)(xi). Dr. Cheng is willing to provide all required documentation, including, but not limited to, an Agreement to Forfeit Real Property. Dr. Cheng and his wife are the property’s sole owners. They will further promise not to sell, mortgage, or otherwise encumber it or do anything

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<sup>1</sup> “Property ID: 37226 For Year 2020” Brazos County Appraisal District Property Search, available at <https://esearch.brazoscad.org/Property/View/37226> (last viewed February 26, 2021).

reduce its value while this agreement is in effect. The Court may forfeit this and the other pledged properties if Dr. Cheng fails to appear under the terms of the agreement, Fed. R. Crim. Pro. 46(i), and 18 U.S.C. 3146(d).

## **II. CONCLUSION**

Dr. Cheng requests the Court to grant this Motion, revoke the detention order, set this matter for a hearing, and release him upon appropriate conditions.

Respectfully Submitted,

**HILDER & ASSOCIATES, P.C.**

/S/ Q. Tate Williams

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served upon the Assistant United States Attorney for the government herein, via ECF contemporaneous with filing.

/S/ Q. Tate Williams

Quentin Tate Williams